

STUDENT RECORDS POLICY

PURPOSE	The purpose of this Policy is to protect the privacy of student records and set out how student records will be collected, used, accessed, disclosed, and retained in accordance with the Access to Information and Protection of Privacy Policy and Freedom of Information and Protection of Privacy Act (FIPPA).
SCOPE	<p>This Policy applies to the collection, use, access, disclosure, and retention of Student Records, as defined below.</p> <p>This Policy applies to all Brock staff, faculty, and volunteers.</p> <p>If any provision of this Policy is found to be inconsistent with the provisions of a collective agreement, the collective agreement will prevail, unless the Policy provision is required by law, in which case the Policy provision will prevail.</p>
POLICY STATEMENT	The University is committed to protecting the privacy of students and will collect, use, access, disclose, and retain Student Records in accordance with this Policy.
A. COLLECTION OF PERSONAL INFORMATION	<p>Personal Information of applicants and students will be collected in accordance with this Policy and the Access to Information and Protection of Privacy Policy.</p> <p>The University will notify applicants and students regarding the collection of their Personal Information through a collection notice in the University Calendar.</p>
B. USE OF STUDENT RECORDS	Personal Information collected/Student Records will be used to admit, register and graduate students, record achievement, issue student identification cards, and administer and operate academic, athletic, recreational, residences and other University programs.

By applying for admission to Brock University and by enrolling in a program at the University, applicants and students consent to the use of their Personal Information by Brock University for these purposes.

C. ACCESS TO STUDENT RECORDS

All access to and disclosure of Student Records must be in compliance with FIPPA and the [Access to Information and Protection of Privacy Policy](#).

Employee Access

University employees are permitted access to information contained in Student Records if they need to know the information in order to perform their duties. Only employees involved in academic administration, alumni relations, development and donor relations, or student affairs will have access to Student Records and only to the extent necessary to perform their duties. Any other access must be approved by the Registrar or Dean of the Faculty of Graduate Studies or their designate(s).

Student Access

Students have the right to review their own Student Records, with the exception of evaluations and letters of reference supplied by the University.

Paper records: Student access to the paper records in their Student File, and the steps to correction of Personal Information, is outlined in the Student Records Access and Disclosure Procedure.

Electronic records: Student access to the electronic records are available using the Student Information System.

Access to transcripts generated by Brock University

Copies of student transcripts will be issued at the student's request, subject to reasonable notice and payment of the applicable fee.

Withholding of Degree or Grades

Only the Office of the Registrar may release final grades. No student owing the University fees or fines will receive a diploma, certificate, transcript or a statement of final grades or have any such statements officially communicated to parties outside the University, until such time as the debts have been cleared to the satisfaction of the University.

Access to transcripts generated by other institutions

Documents pertaining to a student's achievement at another institution which have been received by the University will not be released except pursuant to an access request under and in accordance with the Access to Information and Protection of Privacy Policy, Requests may be redirected to another institution.

D. DISCLOSURE TO THIRD PARTIES

Public disclosure

The University will disclose information about students who have graduated, which is considered to be public information, as follows:

- a) degree(s) obtained and the dates conferred by the University, and scholarships and the dates awarded, unless requested not to disclose by the graduate.

Disclosure to third parties

Except as specified below, other information contained in student records (including current registration status and program of study) will be disclosed to persons other than employees only with the student's written consent or as permitted or required by FIPPA. This restriction applies to requests from parents, spouses, and credit bureaus.

Information may be shared with the following parties to facilitate the proper administration of the University, including

- Other universities and colleges to verify any information provided as part of an application for admission;
- Other universities and colleges to share incidences of falsified documents or credentials, or share information fraudulent applications for admissions;

- Government offices to verify information regarding an application for admission and to support processes for government financial aid;
- Other universities and colleges with which Brock University maintains a collaborative program partnership;
- Service providers contracted by Brock University to support business processes (e.g. tenant insurance).

All requests from other third-party organizations must be approved by the Office of the Registrar, the Faculty of Graduate Studies as appropriate, or processed as a FIPPA request by the Freedom of Information and Privacy Office.

If someone other than the student wishes to pick up a document on behalf of a student (e.g. diploma), the student must provide that person with a signed authorization. The third party must provide the signed authorization as well as government issued photo identification.

Disclosure to Student Organizations

Student information may be shared with the Brock University Student's Union (BUSU) and Brock University Graduate Students' Association (GSA), as well as other constituent organizations, if a written request is signed and submitted by an authorized officer of the union and approved by the Office of the Registrar/Faculty of Graduate Studies as appropriate.

The Personal Information disclosed is to be specific and limited and is only to be used for the purposes of membership administration, elections, annual general meetings, transit passes, its health plan, and other authorized purposes. The type of personal information shared is name, email address, and registration status. Information provided is released by the Office of the Registrar/Faculty of Graduate Studies to BUSU/GSA with the understanding that the information will not be disclosed to third parties (and will be destroyed after its use and/or returned to the Office of the Registrar/Faculty of Graduate Studies when requested).

All student organizations are required to sign FIPPA-compliant confidentiality agreements prepared by the Office of the Registrar, or Faculty of Graduate Studies as

applicable, before obtaining access to student personal information. Student information must only be used or disclosed in accordance with the provisions of the confidentiality agreements.

Legally mandated disclosures

Specified records or portions of records may be provided to persons or agencies pursuant to a court order in situations where the University is required to comply with the law, and as part of law enforcement investigations or proceedings (e.g. police, CSIS and immigration).

Disclosure in Emergency or Compassionate Situations

In compelling circumstances affecting the health and safety of an individual and in certain compassionate situations relating to individuals who are injured, ill or deceased, the Registrar / Dean, Faculty of Graduate Studies or their designate(s) may authorize the release of information from student records as appropriate in the circumstances.

The University must then inform the student of the disclosure by mailing a disclosure notification to the last known address of the student.

Notification of Disclosure of Personal Information to Statistics Canada

Brock is required to provide Statistics Canada with data on students and graduates. To opt out of this disclosure, students must follow the steps outlined in the Student Records Access and Disclosure Procedure.

Notification of Disclosure to the Ontario Ministry of Colleges and Universities

Brock is required to disclose personal information such as Ontario Education Numbers, student characteristics and educational outcomes to the Ministry of Colleges and Universities under s. 15 of the Ministry of Training Colleges and Universities Act, R.S.O., 1990, Chapter M. 19, as amended.

E. CORRECTION

Students have the right to request that erroneous information contained in their records be corrected and that

third-party recipients of any information found to be in error be advised of the correction.

F. RETENTION & DESTRUCTION

Original copies of the student record maintained by the Office of the Registrar, Faculty of Graduate Studies will be destroyed five (5) years after a student has ceased to be registered and has not re-registered. Information stored on the Student Information System shall be retained indefinitely.

All student records will be retained and disposed of in accordance with the University’s Records Management Policy.

Exceptions to the requirements outlined above must be discussed beforehand with the Registrar or the Dean of Graduate Studies as appropriate.

DEFINITIONS

See Appendix A

COMPLIANCE AND REPORTING

This Policy is under the jurisdiction of the Provost and Vice-President, Academic. The interpretation and application of this Policy is the responsibility of the Registrar and Dean of the Faculty of Graduate Studies. Any suspected or confirmed breach of this policy must be immediately reported in accordance with the [Privacy Breach Notification Procedure](#).

Policy owner:	Provost and Vice-President Academic
Policy lead:	Registrar
Classification:	Operational
Approval:	Executive Team (President and Vice-Presidents) [date]
Effective date:	November 2021
Next review:	November 2024
Revision history:	New - replaces Access to Student Records and Disclosure of Information Policy February 2007
Related documents:	<ul style="list-style-type: none"> • Freedom of Information and Protection of Privacy Act • Access to Information and Protection of Privacy Policy • Collection of Personal Information Procedure • Use and Disclosure of Personal Information Procedure

	<ul style="list-style-type: none">• Records Management Policy• Records Classification Retention Schedule
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Appendix A - Definitions

As defined by the Freedom of Information and Protection of Privacy Act (FIPPA):

Record

“record” means any record of information however recorded, whether in printed form, on film, by electronic means or otherwise, and includes,

- (a) correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof, and
- (b) subject to the regulations, any record that is capable of being produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution; (“document”)

Student Records:

“Student Records” means records relating to student admission, registration, and academic performance held by the Office of the Registrar and the Faculty of Graduate Studies. Paper records are held in a physical file, and electronic records are held in the Student Information System.

- Physical file - the collection of hard copy student records, including:
 - Transcripts of prior academic activity
 - Academic misconduct and appeals
- Electronic file - records submitted or created electronically and held in the Student Information System, including:
 - Student Number
 - Biographical information
 - Admission and registration data

Personal Information

“Personal Information” means recorded information about an identifiable individual, including,

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,

- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except where they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (g) the views or opinions of another individual about the individual, and
- (h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual; ("renseignements personnels")

Business identity information, etc. Personal information does not include the name, title, contact information or designation of an individual that identifies the individual in a business, professional or official capacity.